

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. | _____ |
| v. | : | DATE FILED: | _____ |
| MARKEE TYRELL BRANTLEY | : | VIOLATION: | 21 U.S.C. § 846 (conspiracy to distribute more than 50 grams of cocaine base ("crack") - 1 count) 21 U.S.C. § 841(a)(1) (distribution of more than 5 grams of cocaine base ("crack") - 2 counts) 21 U.S.C. § 853 (notice of criminal forfeiture) |

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From on or about August 1, 2003, through on or about August 18, 2003, at Allentown, in the Eastern District of Pennsylvania, and elsewhere, the defendant

MARKEE TYRELL BRANTLEY

conspired and agreed, with others known to the United States Attorney, to knowingly and intentionally distribute more than 50 grams, that is, approximately 67.8 grams of a mixture and substance containing cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

1. It was part of the conspiracy that defendant MARKEE TYRELL BRANTLEY obtained approximately 67.8 grams of crack cocaine from his supplier in

Allentown, Pennsylvania between August 1, 2003 and August 18, 2003, for further distribution in Allentown.

2. Defendant MARKEE TYRELL BRANTLEY delivered quantities of crack cocaine to customers in Allentown, Pennsylvania and collected money for those crack cocaine sales.

3. Defendant MARKEE TYRELL BRANTLEY used telephones to facilitate the distribution of crack cocaine in Allentown, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objectives, the following overt acts, among others, were committed by the defendant in the Eastern District of Pennsylvania:

1. On or about August 9, 2003, in Allentown, Pennsylvania, defendant MARKEE TYRELL BRANTLEY obtained a quantity of crack cocaine from his supplier in Allentown, Pennsylvania.

2. On or about August 9, 2003, in Allentown, Pennsylvania, defendant MARKEE TYRELL BRANTLEY drove a 2000 Infinity automobile, PA Reg. # DA34L9, to the area of 5th and Walnut Streets and met with a cooperating witness known to the United States Attorney (hereafter "CW"). Defendant MARKEE TYRELL BRANTLEY sold approximately 27.3 grams of crack cocaine to the CW and received \$1,100 in United States currency from the CW as payment for the crack cocaine.

3. On or about August 18, 2003, in Allentown, Pennsylvania, defendant MARKEE TYRELL BRANTLEY obtained a quantity of crack cocaine from his supplier in Allentown, Pennsylvania.

4. On or about August 18, 2003, in Allentown, Pennsylvania, defendant MARKEE TYRELL BRANTLEY drove a 2000 Infinity automobile, PA Reg. # DA34L9, to the area of 5th and Walnut Streets and met with a cooperating witness known to the United States Attorney (hereafter "CW"). Defendant MARKEE TYRELL BRANTLEY sold approximately 40.5 grams of crack cocaine to the CW and received \$1,650 in United States currency from the CW as payment for the crack cocaine.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about August 9, 2003, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, defendant,

MARKEE TYRELL BRANTLEY,

knowingly and intentionally distributed more than five grams, that is approximately 27.3 grams of a mixture or substance containing cocaine base (“crack”), a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about August 18, 2003, at Allentown, in the Eastern District of
Pennsylvania, defendant

MARKEE TYRELL BRANTLEY

knowingly and intentionally distributed more than five grams, that is approximately 40.5 grams,
of a mixture or substance containing cocaine base (“crack”), a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

NOTICE OF CRIMINAL FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in this indictment, defendant

MARKEE TYRELL BRANTLEY,

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, the following property:

(A) Any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the violations of Title 21, United States Code, as charged in this indictment, including a 2000 Infinity automobile, PA Reg. DA34L9, and a Taurus .45 caliber pistol, serial no. NVL12785; and

(B) any property, including but not limited to the sum of \$5,000, which constitutes and is derived from proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this indictment.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendant.

All pursuant to Title 21, United States Code, Section 853.

PATRICK L. MEEHAN
United States Attorney